

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

RAMAS CAPITAL MANAGEMENT, LLC,
GANESH H. BETANABHATLA,

Defendants.

C.A. No.: 4:22-cv-2979

Jury Trial Demanded

PLAINTIFF’S DESIGNATION OF EXPERT WITNESS

Pursuant to this Court’s Scheduling Order (Dkt. No. 15), Plaintiff Securities and Exchange Commission (“SEC”) designates **Arthur B. Laby** as a retained expert witness in this case. Mr. Laby is a Professor of Law at Rutgers Law School, and Co-Director of the Rutgers Center for Corporate Law and Governance. Mr. Laby will: (a) provide background information about investment advisers and investment funds; (b) testify on industry standards of care and conduct for investment advisers, including investment advisers that advise private investment funds; and (c) testify on Defendants’ conduct in relation to those standards. A

copy of Mr. Laby's CV is attached as Exhibit A. The SEC will serve Mr. Laby's expert report in accordance with the Court's Scheduling Order.

Dated: January 30, 2023

Respectfully submitted,

/s/Keefe M. Bernstein

Keefe M. Bernstein

Attorney-in-Charge

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Securities and Exchange Commission

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CERTIFICATE OF SERVICE

I affirm that on January 30, 2023, I caused the foregoing to be electronically filed with the Clerk of the Court for the Southern District of Texas, Houston Division, by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants.

/s/ Keefe M. Bernstein

Keefe M. Bernstein